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10:33 am, Mar 25 2025  
AT BALTIMORE  
CLERK, U.S. DISTRICT COURT  
DISTRICT OF MARYLAND  
BY KM Deputy

**AFFIDAVIT IN SUPPORT OF A SEARCH WARRANT**

I, Grace Meyer, a Special Agent with the Federal Bureau of Investigation (FBI), Baltimore Division, Baltimore, Maryland, being duly sworn, depose and state as follows:

1. I am a Special Agent of the FBI and have been so employed since February 2023. As such, I am an officer of the United States who is empowered by law to conduct investigations of and to make arrests for offenses enumerated in Titles 18 and 21 of the United States Code. I am currently assigned to the FBI Child Exploitation and Human Trafficking Task Force in Baltimore, Maryland. I have duties that include investigations of federal violations concerning child pornography and the sexual exploitation of children. I have participated in the execution of multiple search warrants, which have resulted in the seizure of computers, cell phones, electronic media, and other items evidence violations of federal laws. I have also participated in the execution of search warrants for online accounts, such as email accounts, online storage accounts and other online communication accounts related to child exploitation and/or child pornography.

2. This affidavit is made in support of an application for a search warrant to photograph the person of David Donnell Fulton (“Fulton”), (more fully described in Attachment A), there being probable cause to believe that such photographs will contain evidence of violations of Title 18, United States Code, Section 2251(a) (production of child pornography) (the “TARGET OFFENSE”).

3. The statements in this affidavit are based in part on information and reports provided by the Dauphin County (Pennsylvania) Criminal Investigation Division (“Dauphin County CID”), on my investigation of this matter, and on my experience and background as a Special Agent of the FBI. Since this affidavit is being submitted for the limited purpose of securing a search warrant, I have not included each and every fact known to me concerning this

investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that evidence, fruits, and instrumentalities of the violations of the TARGET OFFENSE are located in the place described in Attachment A.

**PROBABLE CAUSE**

4. On April 7, 2024, Dropbox, Inc.<sup>1</sup> (“Dropbox”) sent a CyberTipline Report to NCMEC and listed the Incident Type as “Child Pornography (possession, manufacture, and distribution.)” This report indicated that on April 6, 2024, at 21:55:32 UTC, three files, to include two video files depicting minors engaged in sexually explicit conduct, were uploaded to the Dropbox account associated with email address davidfulton820@icloud.com, username “Quick Brim”, and IP address 2601:547:b00:fac:f1c8:e216:f45:81f6. Descriptions of the two video files are as follows:

a. Video file “2017-06-09 14.05.21.mp4” is a color video with audio approximately 1 minute and 2 seconds in length depicting a prepubescent female child with her legs up and jeans pulled down to her mid-thigh, fully exposing her vagina. The child does not have any pubic hair. At the beginning of the video, an adult male can be heard saying “put your legs up, put your legs up, put your legs all the way up.” Throughout the video, the adult male attempts to vaginally penetrate the child with his penis and masturbates. The adult male also ejaculates on the child’s vagina.

b. Video file “26dbf2e7-1a1f-45fa-94b3-5e84c5cba3ee.mp4” is a color video with audio approximately 1 minute and 48 seconds in length depicting an adult male attempting to anally penetrate a minor child who appears to be bent over and facedown. Throughout the video the adult male masturbates his penis and rubs it over the buttocks of the minor child.

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<sup>1</sup> Dropbox, Inc. is a company that operates a file hosting service known as Dropbox, which is a cloud storage service that allows users to store, share, and sync files across devices.

5. Also on April 7, 2024, Dropbox sent another CyberTipline Report to NCMEC and listed the Incident Type as “Child Pornography (possession, manufacture, and distribution.)” This report indicated that on April 6, 2024, at 22:03:23 UTC, two files, to include one video file depicting a minor engaged in sexually explicit conduct, were uploaded to the Dropbox account associated with email address ddfulton044@gmail.com and username “David Fulton.” The video file was the same video file described in paragraph 4a and titled “2017-06-09 14.05.21.mp4.”

6. On May 15, 2024, pursuant to a subpoena, Comcast identified the subscriber associated with IP address 2601:547:b00:fac:f1c8:e216:f45:81f6 as David Fulton, with service address 1413 South 15<sup>th</sup> Street, Apartment 101, Harrisburg, Pennsylvania. The service was disconnected on May 4, 2024. Comcast further identified the service was transferred to David Fulton, with service address 1408 South 15<sup>th</sup> Street, Apartment 304, Harrisburg, Pennsylvania. Investigators consequently confirmed that Fulton, his wife, and their three minor children recently moved from 1413 South 15<sup>th</sup> Street, Apartment 101, to 1408 South 15<sup>th</sup> Street, Apartment 304.

7. On May 31, 2024, investigators with the Dauphin County CID executed a search warrant issued by the Honorable Royce Morris of the Dauphin County Court of Common Pleas for the residence located at 1408 South 15<sup>th</sup> Street, Apartment 304, Harrisburg, Pennsylvania. Fulton was present at his residence during the execution of the search warrant and was mirandized by investigators.

8. One of the electronic devices located during the execution of this search warrant was Fulton’s Apple iPhone 12 bearing IMEI 351588825226136. During an on-scene preview of this Apple iPhone, investigators located a color image which depicted the left hand of an adult male pulling to the side the underwear of a prepubescent female child, Minor Victim, exposing the child’s vagina, which is the focal point of the image. The underwear was gray in color with white

flowers. Minor Victim's body is pictured from the lower portion of her torso to the middle of her thigh. Minor Victim does not have any pubic hair, and her legs are slightly spread. A distinctive tattoo can be seen on the back of the adult male's left hand.

9. Investigators observed the same distinctive tattoo depicted in the image on Fulton's left hand. Fulton was consequently detained and transported to the Dauphin County CID for an interview. During this interview, Fulton admitted to taking the image described above several days prior to the execution of the search warrant while Fulton and his family were staying at the Great Wolf Lodge in Perryville, Maryland. Fulton identified Minor Victim in the image as his daughter's minor friend. Fulton stated he took the image at night when everyone was sleeping in their hotel room at the Great Wolf Lodge. Fulton advised he planned on making money from the image by selling it to individuals online. Fulton was charged in Dauphin County with the sexual abuse of children and the criminal use of a communication facility, among other charges.

10. On June 13, 2024, Minor Victim was forensically interviewed, but she made no disclosures.

11. On November 15, 2024, pursuant to a subpoena, Great Wolf Lodge in Perryville, Maryland, provided reservation records which indicated Fulton's wife made a reservation for one room for two adults and four children from May 27, 2024 through May 28, 2024, just days before the Dauphin County CID executed the search warrant at Fulton's residence.

12. On January 22, 2025, I telephonically interviewed the mother of Minor Victim, who advised Minor Victim does have gray colored underwear with white flowers. On January 27, 2025, the mother of Minor Victim provided me with a picture of Minor Victim's gray colored underwear with white flowers, which are consistent in appearance with the underwear depicted in the image located on Fulton's Apple iPhone.

**SUMMARY**

13. Based on the facts detailed above, as well as my training and experience, Fulton appears to have a sexual interest in children which includes producing an image depicting the lascivious exhibition of a prepubescent female child's genitalia and saving the image. The image described in paragraph 8 of this affidavit, which was located on Fulton's Apple iPhone and believed to have been taken in a hotel room in Perryville, Maryland, shows the perpetrator's left hand, but not his face, as previously described.

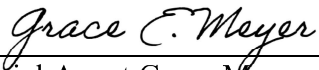
14. I am requesting this particular search in order to positively identify whether or not Fulton produced the sexually explicit image of Minor Victim.

**CONCLUSION**

15. Based on the foregoing information, I have probable cause to believe that in the place described as Attachment A is evidence described in Attachment B, being evidence of the violations of Title 18, United States Code, Section 2251(a) (production of child pornography).

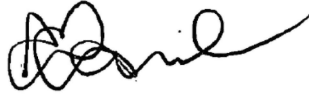
16. I therefore respectfully request that the search warrant be issued authorizing the search of the person described in Attachment A and seizure of the items described in Attachment B. In addition, I request that law enforcement be authorized to direct the person described in Attachment A to place his left hand in a certain position that is consistent with the image referenced in this affidavit.

17. The photographs will be taken in a private area at the United States Marshals Service, located within the Edward A. Garmatz United States District Courthouse in Baltimore, Maryland, where Fulton will be held pending an initial appearance.

  
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Special Agent Grace Meyer  
Federal Bureau of Investigation

Affidavit submitted by email and attested to me as true and accurate by telephone consistent with Fed. R. Crim. P. 4.1 and Fed. R. Crim. P. 41(d)(3) this 4<sup>th</sup> day of March, 2025.





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Honorable Erin Aslan  
United States Magistrate Judge  
District of Maryland

**ATTACHMENT A**

**DESCRIPTION OF LOCATION TO BE SEARCHED**

The person of David Donnell Fulton, date of birth xx/xx/1993, Social Security Number XXX-XX-9482.

**ATTACHMENT B**

Photographs of the hands of the person described in Attachment A, which constitutes evidence of the commission of violations of Title 18, United States Code, Sections 2251(a), production of child pornography. During the course of the search, law enforcement is authorized to direct the person described in Attachment A to place his left hand in a certain position that is consistent with the image referenced in this affidavit.